

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS**

**IN RE:** § **Bankruptcy Case No. 25-30155**  
**ALLIANCE FARM AND RANCH, LLC** §

**CREDITOR DUSTIN ETTER'S REPLY TO DEBTOR'S OBJECTION TO  
CREDITOR'S MOTION TO DISMISS**

Creditor Dustin Etter files this Reply to Debtor's Objection to Creditor's Motion to Dismiss.

1. Creditor's Motion contained a certificate of service and was e-served on Debtor's counsel through the Court's ECF/CM system. There is no dispute that Debtor's counsel actually received the Motion. Debtor obviously has the Motion because Debtor responded to it.
2. It is not true that Creditor has no interest in this case. Creditor has claims against the Debtor for money and for property, both directly and derivatively, as outlined in Creditor's Motion to Dismiss and its attachments.
3. Debtor does not dispute that Debtor has not been diligent in the prosecution of this case. Absent material action and effort on behalf of Debtor to diligently prosecute this case, it should not be allowed to simply linger on.

## **PRAYER**

4. It is therefore requested and prayed that the Court dismiss this case and grant  
Etter such other and further relief to which he may be justly entitled.

Respectfully submitted,

IRELAN McDANIEL, PLLC

By: /s/ Noah Meek

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ATTORNEYS FOR CREDITOR  
DUSTIN ETTER

**CERTIFICATE OF SERVICE**

This is to certify that on March 14, 2025, a true and correct copy of this instrument was served upon all parties **VIA the Court's CM/ECF System** in compliance with the Federal Rules of Civil Procedure.

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/s/ Noah Meek

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